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Order Filed on November 9, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	Chapter 13
William Edward Freeman,	Case No. 22-19677-MBK
	Hearing Date: December 27, 2023 at 9:00 a.m.
Debtor.	Judge: Michael B. Kaplan

**CONSENT ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY AND PROVIDING FOR CURE OF POST-PETITION  
ARREARS**

The relief set forth on the following pages, number two (2) through three (3) is hereby

**ORDERED**

**DATED: November 9, 2023**

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".  
\_\_\_\_\_  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

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Debtor: William Edward Freeman  
Case No.: 22-19677  
Caption of Order: **CONSENT ORDER RESOLVING SECURED CREDITOR'S  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
AND PROVIDING FOR CURE OF POST-PETITION  
ARREARS**

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THIS MATTER having been opened to the Court upon the Motion to Vacate Automatic Stay ("Motion") filed by M&T Bank ("Secured Creditor"), and William Edward Freeman ("Debtor") having filed an opposition thereto, with respect to the property known 254 Beacon Light Rd, Califon, NJ 07830 ("Property"), and the Court noting the consent of the parties to the form, substance, and entry of the within Order, and for good cause shown it is hereby:

**ORDERED AS FOLLOWS:**

1. The parties hereby agree that Secured Creditor has a fully secured claim in the amount of \$265,642.40 (the "Secured Creditor"), with an interest rate of 5.125% per annum.
2. Debtor shall sell the Property by December 31, 2023. If the Debtor cannot do so, Debtor shall file an amended plan no later than December 31, 2023 proposing to cure all pre and post-petition arrears owed to Secured Creditor or surrendering the Property. If Debtor fails to do the foregoing, Secured Creditor may seek stay relief based on the failure to comply with the terms of this Consent Order.
3. Debtors are hereby notified and acknowledge that in the event that less than the full payoff amount is to be tendered at closing, such short sale is subject to Secured Creditor's review and approval.
4. Debtor shall make adequate protection payments to Secured Creditor pending the sale of the Property in the amount of \$2,787.90, beginning November 1, 2023.
5. Debtor is hereby notified and acknowledges that the escrow payment is subject to change during the pendency of this case and that she shall adjust adequate protection payments to pay the full escrow amount in accordance with any filed payment change notice.

6. If Debtor should default and fail to make future post-petition payments to Secured Creditor that come due during the pendency of this case for thirty (30) days from the due date, Secured Creditor's counsel may submit a certification of default and the Court may enter an Order vacating the automatic stay permitting Secured Creditor to proceed with its action against the real property known as 254 Beacon Light Rd, Califon, NJ 07830.
7. Upon dismissal, chapter conversion, or relief from stay, the foregoing terms and conditions shall cease to be binding payments will be due pursuant to the terms of the original loan agreement and Secured Creditor may proceed to enforce its remedies under applicable non-bankruptcy law against the Property and/or against the Debtor.
8. In the event Debtor does not comply with any of the above requirements, or otherwise amend this order to address treatment of Secured Creditor, then Secured Creditor may submit an order providing relief from the automatic stay without further application to the Court.
9. Debtor shall pay attorney fees and costs for the motion for relief in the amount of \$688.00 to be paid as an administrative claim through the plan.

Consent to Form and Entry

McCalla Raymer Leibert Pierce, LLC  
Attorney for the Secured Creditor

By: /s/ Laura Egerman  
Laura Egerman

Date: 11/2/2023

Karina Pia Lucid, ESQ., LLC  
Attorney for the Debtor

By: Karina Pia Lucid

Date: 11/11/2023

In re:  
William Edward Freeman  
Debtor

Case No. 22-19677-MBK  
Chapter 13

District/off: 0312-3  
Date Rcvd: Nov 13, 2023

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

**Symbol      Definition**

- + Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 15, 2023:**

Recip ID	Recipient Name and Address
db	+ William Edward Freeman, 254 Beacon Hill Road, Califon, NJ 07830-3519

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Nov 15, 2023

Signature: /s/Gustava Winters

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 13, 2023 at the address(es) listed below:

Name	Email Address
Albert Russo	docs@russotrustee.com
David Fornal	on behalf of Creditor Picatinny Federal Credit Union dfornal@maselliwarren.com
Denise E. Carlon	on behalf of Creditor M&T BANK dcarlon@kmllawgroup.com bkgroup@kmllawgroup.com
Karina Pia Lucid	on behalf of Debtor William Edward Freeman klucid@karinalucidlaw.com 15020@notices.nextchapterbk.com;admin@karinalucidlaw.com
Laura M. Egeman	on behalf of Creditor M&T BANK laura.egeman@mccalla.com mccallaecf@ecf.courtdrive.com
Richard Gerbino	

District/off: 0312-3

User: admin

Page 2 of 2

Date Rcvd: Nov 13, 2023

Form ID: pdf903

Total Noticed: 1

on behalf of Creditor M&T BANK rgerbino@schillernapp.com lgadomski@ecf.courtdrive.com;lgadomski@schillernapp.com

U.S. Trustee

USTPRegion03.NE.EDCF@usdoj.gov

William M. E. Powers, III

on behalf of Creditor Bank of America N.A. ecf@powerskirn.com

William M.E. Powers

on behalf of Creditor Bank of America N.A. ecf@powerskirn.com

William M.E. Powers, III

on behalf of Creditor Bank of America N.A. ecf@powerskirn.com

TOTAL: 10